

FILED 19 MAY 25 2025 11:00AM SD-ORP

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

Portland DIVISION

Tyler William Long  
 (Enter full name of plaintiff)

Civil Case No. 25-858  
 (to be assigned by Clerk's Office)

Plaintiff,

v.

COMPLAINT FOR VIOLATION OF CIVIL  
 RIGHTS (PRISONER COMPLAINT)

OHSU,  
C/O Adventist Medical Center  Yes  No  
Dr. Steven Lambrou

(Enter full name of ALL defendant(s))

Jury Trial Demanded

Defendant(s).

## I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Tyler William Long #750846  
 Street Address: 11540 NE Inverness Dr.  
 City, State & Zip Code: Portland, OR 97220  
 Telephone No.: 254 217 8139

**Defendant No. 1**

Name: OHSU (Oregon Health Science University)  
 Street Address: 3181 SW Jackson Park Rd.  
 City, State & Zip Code: Portland, OR  
 Telephone No.: \_\_\_\_\_

**Defendant No. 2**

Name: Adventist Medical Center  
 Street Address: 10300 SE Main St.  
 City, State & Zip Code: Portland, OR 97216  
 Telephone No.: \_\_\_\_\_

**Defendant No. 3**

Name: DR MD Steven Lambrou  
 Street Address: 10300 SE main St.  
 City, State & Zip Code: Portland, OR 97216  
 Telephone No.: \_\_\_\_\_

**Defendant No. 4**

Name: \_\_\_\_\_  
 Street Address: \_\_\_\_\_  
 City, State & Zip Code: \_\_\_\_\_  
 Telephone No.: \_\_\_\_\_

## II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

Federal officials (a *Bivens* claim)  
 State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

42 USC §1983, 18 USC §1503, 18 USC §242  
8th and 14th Amendment violated

### III. STATEMENT OF CLAIMS

#### Claim I

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

On 2-20-25 I was admitted to Adventist due to Traumatic GSW, I was treated poorly and was instantly profiled when police put handcuff on me. As the result of being profiled and Neglected, I was pre-maturely discharged into police custody via Police car, in which Trauma patient protocol was ignored and lack of professionalism was demonstrated. Such negligence resulted in resuscitation was need at 2nd hospital later that afternoon.

#### Claim II

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

Adventist Medical Center is owned and operated by Oregon Health Science University

OKC has certain protocols around Medical Transportation/trauma care Etc Etc. I Believe that I was treated Unfairly and neglected on ~~as~~ not only a biased but very prejudice way. all in which result in a Un-Justifiable manner. I hope nobody need go throw this, Especially, @ a time in duer need of proper Medical attention

### Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

DR. Lambrew Was the discharging Doctor ~~at~~ @ advertise Emergency Room day of Incident 2-20-2025. I lost 1 litre of blood in holding cell. I dont believe this would have happened given that DR. followed protocol and put me in a ambulance rather a police car. I'm confident in saying, the discharging DR. willingly and knowingly, neglected to see proper protocols all the way through.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

#### IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

Yes       No

#### V. RELIEF

*State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.*

Wherefore Tyler Long respectfully pray that this court enter judgement by granting Tyler Long a determination that the acts and omissions described herein violate his rights under the Constitution and laws of the United States and granting Tyler Long compensatory damages in the amount of 10million dollars against facility and 1million dollars to each defendant joint and severally.

Tyler Long also seeks ~~2.5 million~~ 2.5million for punitive damages, also procuring Criminal Charges to highest Extent possible

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8<sup>th</sup> day of MAY, 2025.

  
(Signature of Plaintiff)